

WILKINSON ) BARKER ) KNAUER ) LLP

2300 N STREET, NW  
SUITE 700  
WASHINGTON, DC 20037  
TEL 202 783 4141  
FAX 202 783 5851  
www.wbklaw.com

RECEIVED

April 19, 2004

APR 19 2004

Ms. Marlene H. Dortch  
Secretary of the Commission  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

John Muleta  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

David Solomon  
Chief, Enforcement Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *Litchfield County Cellular, Inc.*  
*E911 Interim Report for Tier III Carriers*  
*CC Docket No. 94-102*

Dear Ms. Dortch:

Pursuant to the Commission's Order to Stay, in the above referenced docket,<sup>1</sup> Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon ("LCC") hereby submits its E911 Interim Report for Tier III Carriers. This Report provides the Commission with the current status of LCC's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks.<sup>2</sup>

<sup>1</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers, CC Docket 94-102, Order to Stay, FCC 03-241, 18 FCC Rcd 20,987 (2003).*

<sup>2</sup> LCC respectfully requests waiver of the January 15, 2004 deadline for filing this Interim Report and asks that the Commission accept this report *nunc pro tunc* as of the applicable deadline. The delay in filing this Interim Report was the result of an administrative oversight. As this Report documents, LCC has been channeling its efforts into Phase I implementation.

No. of Copies rec'd 074  
List ABCDE

WILKINSON ) BARKER ) KNAUER ) LLP

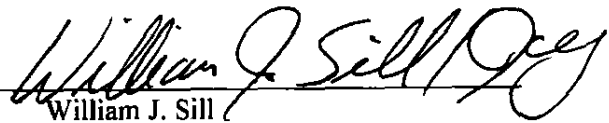
Ms. Marlene H. Dortch  
April 19, 2004  
Page 2

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:

  
William J. Sill  
J. Wade Lindsay

Attachment

## **INTERIM REPORT FOR TIER III CARRIERS**

### **LITCHFIELD COUNTY CELLULAR, INC. D/B/A RAMCELL OF OREGON Block B licensee of Oregon 5 – Coos RSA**

Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon (“LCC”) hereby provides the Commission with its E911 Interim Report (“Report”) for Tier III Carriers.<sup>1</sup> LCC is the cellular licensee on the Block B frequencies in the Oregon 5 – Coos RSA. In preparing the instant Report, LCC has followed the guidelines provided by the Commission in its June 30, 2003 Public Notice.<sup>2</sup>

LCC understands the importance of E911 and its obligation as a licensee to assist in ensuring that E911 connectivity for Phase I and Phase II service is properly implemented. To that end, LCC originally contracted with a third party vendor to assist with its E911 implementation. LCC, however, has recently hired Intrado to assist in its E911 implementation efforts. Intrado, is a third party vendor experienced in E911 implementation efforts, providing both project management and implementation services to wireless carriers such as LCC. LCC chose to switch to Intrado for two primary reasons. First, Intrado’s Phase II solution will allow LCC to undertake Phase II implementation rapidly after Phase I implementation is complete. Second, Intrado offered LCC significant cost savings while providing the requisite expertise.

#### **The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

LCC has one Phase I PSAP request, dated October 19, 1999, from the Oregon Emergency Management, Department of State Police. This PSAP request was intended, however, to cover all the PSAPs in the State of Oregon. LCC has not received any Phase II requests from any PSAPs within its licensed service area. There are seven (7) PSAPs throughout the OR-5 RSA. The seven PSAPs are: Douglas County Sheriff’s Office; Douglas County, Myrtle Creek Police Department; Coos County Sheriff’s Office; Coos County 9-1-1 Center, Coos Bay Police Department; Josephine County 9-1-1 Center; Curry County Sheriff’s Office, and; Curry County 9-1-1 Center, Brookings Police Department. Of these seven, the following four PSAP centers are the answering points for 9-1-1 calls within their counties: Josephine County 9-1-1 Center; Coos County 9-1-1 Center; Curry County 9-1-1 Communications, and; Douglas County Sheriff’s Office. These four centers will be the answering points for their counties and will transfer calls for the small PSAPs in Brookings (Brookings Police Dept), Coos Bay (Coos Bay Police Dept.) and Myrtle Creek (Myrtle Creek Police Dept).

LCC is working with the PSAPs in LCC’s service area to ensure reliable E911 Phase I service. Prior to LCC’s switch to Intrado, LCC’s former vendor conducted regularly scheduled meetings with the PSAPs to discuss implementation milestones and the work that needed to be

---

<sup>1</sup> LCC respectfully requests waiver of the January 15, 2004 deadline for filing this Interim Report and asks that the Commission accept this report *nunc pro tunc* as of the applicable deadline. The delay in filing this Interim Report was the result of an administrative oversight.

<sup>2</sup> See Public Notice, Wireless Telecommunications Bureau Provides Further Guidance On Interim Report Filings by Small Sized Carriers, DA 03-2113, rel. June 30, 2003.

done to achieve these milestones. LCC is now sponsoring such coordination meetings. In addition, surveys and information requests were sent to the PSAPs and the LEC in order to ascertain the various elements and components of E911 Phase I that LCC would need to implement. This information was essential for LCC to begin implementation efforts and to establish the requisite implementation schedule.

Originally, LCC requested that the PSAPs return their surveys by March 18, 2003. With the exception of the Coos Bay Police Department, all the PSAPs returned their surveys in late April 2003. Moreover, LCC requested that the Josephine County 9-1-1 Communications Center PSAP ("Josephine PSAP") and the Douglas County Sheriff's Office PSAP return updated Master Street Address Guides ("MSAG") by March 2003. The MSAG is a critical document as it provides information regarding where emergency rescue efforts should be sent. The Josephine PSAP provided its MSAG update on July 3, 2003 and Douglas County Sheriff's Office has now responded to this request for information. Continued delays by the PSAPs in returning the requested information have contributed in a significant manner to the delays associated with LCC's ability to provide E911 Phase I service because without this most basic information, such as the number of trunks from the selective router to the PSAP or the location of the ALI database, LCC is unable to proceed with implementation.

Similar surveys were also sent to the two LECs that provide service in the Oregon 5 RSA, Verizon and Qwest. Verizon returned its completed survey by December 13, 2002, and Qwest returned all of its information on April 16, 2003.

LCC has completed negotiations and finalized interconnection agreements with Verizon and Qwest. The necessary circuits have therefore been ordered and are now available. LCC expects to complete testing and be ready to go to live users by the end of the second quarter of 2004.

LCC has also purchased two new features to its Lucent 5E switch – FAF 343 and 464 necessary for Phase I implementation. LCC has also contracted with Lucent to undertake the necessary installation and translation processes for these features. This is a time consuming process that LCC expects Lucent to have completed by the second quarter of 2004.

All seven PSAPs have been kept informed of the status of LCC's efforts and, to date, LCC has no indication that the PSAPs are concerned with the progress made by LCC.<sup>3</sup> LCC will continue to work closely with the LECs to work towards the provision of E911 Phase I service. LCC believes that it will be ready to go to live users by the end of the second quarter of 2004.

**The carrier's specific technology choice (i.e., network-based or handset-based solutions, as well as the type of technology used):**

As previously reported to the Commission, LCC will be utilizing a handset-based location technology solution for Phase II E911. LCC has begun this effort by ordering, receiving

---

<sup>3</sup> See 47 C.F.R. § 20.18(j)(5); see also, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Petition of City of Richardson, Texas, CC Docket No. 94-102, Order on Reconsideration, 17 FCC Rcd 24282, 24282 (2002).

and selling CDMA ALI-capable handsets. LCC has sold ALI-capable handsets in sufficient quantities to meet the September 1, 2003 and November 30, 2003 deadlines.

**Status on ordering and/or installing necessary network equipment.**

As LCC has not received any requests for Phase II E911 service, it has not begun to order the network equipment that will be needed to implement Phase II E911 service. LCC is close to successfully implementing Phase I E911 service throughout its service area and anticipates completing this implementation by the end of the second quarter of 2004. LCC will turn to implementation of E911 Phase II service upon completion of Phase I service, despite there being no E911 Phase II service request from any of the PSAPs covering its area. As noted above, LCC believes that Intrado's Phase II E911 solution will allow LCC to deploy E911 Phase II rapidly upon deployment of Phase I.

**If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:**

As noted above, LCC is pursuing a handset-based solution for its CDMA system. LCC has been able to order, procure and sell ALI-capable CDMA handsets.<sup>4</sup> LCC has been able to motivate its subscribers to purchase ALI-capable handsets by featuring them prominently in its handset line and by minimizing the number of non-ALI handsets offered. LCC believes that this effort is aided by the fact that it has been able to obtain CDMA ALI capable handsets which are only marginally more expensive than their non-ALI-capable counterparts.

**The estimated date on which Phase II service will first be available in the carrier's network:**

Without a valid PSAP request for E911 Phase II service, it is difficult for LCC to estimate when such service will be available. Should a PSAP request such service in the near future, however, LCC will work towards responding to such a request within the FCC allocated six-month period.

**Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.**

LCC believes that the December 31, 2005 deadline for a 95% penetration rate by ALI-capable handsets is attainable as long as ALI-based handsets remain available at a wholesale price that is not significantly higher than the wholesale cost of similar non-ALI-capable handsets. LCC will provide the Commission with additional updates if any hurdles appear which could endanger its ability to meet the benchmark deadlines.

---

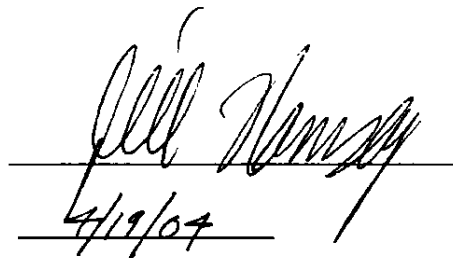
<sup>4</sup> See Litchfield County Cellular, Inc.'s (licensee of KY111) Interim Report for Tier III Carriers filed August 1, 2003.

### DECLARATION OF JILL RAMSEY

I, Jill Ramsey, am an officer of Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon, and I hereby certify that, to the best of my knowledge and belief, the information contained on this form and the attached document is complete and accurate.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

  
4/19/07